



012/345-0220

JUL - 5 1985

CERTIFIED MAIL
#P 011 283 867

Refer to: LPC1191150001 - APC 119 115 AAA
Madison County - Wood River/Arco-Hain Plant



Mr. John G. Huddle, Director
Environmental Control and Planning
Arco Oil Company
200 East Randolph Drive
Chicago, Illinois 60601

Dear Mr. Huddle:

This inquiry concerns apparent noncompliance with the requirements of Land Pollution Control Regulations (Title 35: Illinois Administrative Code, Subtitle 6), Air Pollution Control Regulations (Title 35: Illinois Administrative Code, Subtitle 8), and the State of Illinois Environmental Protection Act. The following apparent violations are based upon the Agency's complaint investigation conducted by Tom Powell and Mike Grant on June 28, 1985.

Division of Land Pollution Control

- 703.154(a) - Failure to include in the facility's Part A of the permit application all methods used to treat, store, or dispose of hazardous waste.
- 725.131 - Failure to maintain and operate the facility to minimize the possibility of any unplanned sudden release or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Division of Air Pollution Control

- 201.142 - Construction of an emission source without obtaining the required Construction Permit.
- 201.143 - Operation of said emission source without obtaining the required Operating Permit.

Apparent Violations of the Environmental Protection Act

- Section 21(f) - No person shall conduct any hazardous waste-storage, hazardous waste-treatment, or hazardous waste-disposal operation without a RCRA permit for the site issued by the Agency under subsection (d) of Section 39 of the Act.



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Please submit in writing, within fifteen (15) calendar days from the date of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps which have been initiated to prevent any further recurrence of the above-cited violations.

Further, take notice that non-compliance with the requirements of the State of Illinois Environmental Protection Act and Illinois Pollution Control Board Rules may be the subject of enforcement action pursuant to the Act, Ill. Rev. Stat., Ch. 111½, Sec. 1001 et seq.

If you have any questions, please contact Mike Grant (Division of Land Pollution Control) at 618/345-4606 or Jeff Benbenek (Division of Air Pollution Control) at 618/345-0700.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, reading "Robert L. Schleuger".

Robert L. Schleuger, P.E.
Regional Coordinator
Collinsville Regional Office

MDG:JJB:cas

cc: Division File, DLPC
cc: Bruce Carlson - Enforcement
cc: DLPC - Collinsville ✓
cc: Bur Filson
cc: DAPC - Central File
cc: DAPC - Region III